

**UNITED STATES DISTRICT COURT**  
 for the  
**Eastern District of Michigan**

United States of America

v.

Sean Moore

Case No.

Case: 2:23-mj-30090  
 Assigned To : Unassigned  
 Assign. Date : 3/6/2023  
 SEALED MATTER (LH)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 21, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a Firearm

This criminal complaint is based on these facts:

Continued on the attached sheet.



*Complainant's signature*

Special Agent Brady Rees, A.T.F.  
*Printed name and title*

Sworn to before me and signed in my presence  
 and/or by reliable electronic means.

Date: March 6, 2023



*Judge's signature*

City and state: Detroit, Michigan

Hon. Anthony P. Patti, U.S. Magistrate Judge  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Brady W. Rees, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests of offenses enumerated under federal law.

2. I have been an ATF Special Agent since January 2016, and I have had extensive law enforcement training, including at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. Prior to becoming an ATF Special Agent, I was a police officer with the City of Novi, in Michigan, for approximately three years. I also have a bachelor’s degree in Criminal Justice.

3. As an ATF Special Agent, I have participated in numerous criminal investigations, including investigations involving firearms, armed drug tracking, and criminal street gangs. I am familiar with, and have experience using, a variety of investigative techniques and resources, including physical and electronic surveillance, undercover and various types of informants, and cooperating sources.

4. I have personal knowledge or have been provided by other law enforcement officers with the facts set forth herein. I have not included each and every fact known to me concerning this investigation; rather I have set forth only the facts necessary to establish probable cause that Sean MOORE violated 18 U.S.C. § 922(g)(1), felon in possession of a firearm.

**PROBABLE CAUSE**

5. I reviewed a computerized criminal history for MOORE, which revealed the following felony convictions:

- a. March 28, 2016 – 3<sup>rd</sup> Circuit Court – Felony Unarmed Robbery
- b. May 30, 2018 – 3<sup>rd</sup> Circuit Court – Felony Motor Vehicle – Unlawful Driving Away
- c. February 19, 2020 – Huntington, WV – Felony – Drugs – Possession with Intent to Deliver Narcotics
- d. October 31, 2022 – Gallia County, OH – Felony – Possession of Controlled Substances

6. In the above convictions, each of which are punishable by more than one year of imprisonment, MOORE pleaded guilty, and MOORE is still on supervision for the 2022 offense. Further, I am aware that the Michigan Court Rules require a court to directly advise a defendant of the maximum possible penalty before accepting a guilty plea. Therefore, probable cause exists that MOORE knew, at the

time he possessed the firearm, he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year.

7. On February 21, 2023, at approximately 4:19 p.m., Detroit Police Officers John Criswell and Officer Lamear Downes were on routine patrol in the area of Puritan Ave., and Washburn St., in Detroit, Michigan. Officers observed a black 2017 Honda Civic with tinted front windows. Officers Criswell and Downes initiated a traffic stop and approached the vehicle. As Officers approached, Officer Criswell observed the driver and sole occupant, later identified as Sean MOORE, reach to the back seat of the vehicle. As Officer Downes made contact with MOORE, Officer Criswell observed the handle of a firearm on the floor of the back seat. Officer Downes ordered MOORE to turn off the vehicle. At this juncture, MOORE put the vehicle in drive and fled westbound on Puritan Ave. At this juncture, officers did not chase but advised dispatch and other Detroit police officers via radio information regarding the vehicle, driver, and firearm.

8. A short time later, Officer Downes and Officer Criswell observed the same black Honda Civic, now with two flat tires on the driver side of the vehicle, while driving in the area of Grove and Ilene Street. At this juncture, Officer Criswell and Officer Downes attempted to initiate another traffic stop. However, the vehicle did not stop and the pursuit was terminated at Fenkell Ave and Stansbury St. Officers continued driving east on Fenkell Ave. and were advised via radio by

Officer Reid and Officer Newman the vehicle was travelling eastbound on Fenkell Ave, passing Schaefer Road. Officer Reid and Officer Newman followed the vehicle eastbound on Fenkell Ave and observed the vehicle drive left of center, lose control, and stop at Ward Street and Fenkell Ave. As Officer Reid and Officer Newman approached the vehicle, Officer Reid observed MOORE exit the driver's seat of the vehicle carrying a black handgun in his hand and run eastbound Fenkell Ave from Ward Street.

9. MOORE fled from the officers to the area of Fenkell and Steele St, where he tripped and fell to the ground, dropping the handgun. At this time, Officer Reid and Officer Newman took MOORE into custody and recovered from the ground a Taurus, G2C, 9mm, semi-automatic pistol, bearing serial number ABJ923143, loaded with one (1) round of ammunition in the chamber and several rounds of ammunition in the magazine.

10. ATF Special Agent Jacobs, a firearms interstate nexus expert, was given a verbal description of the above listed firearms. Based on the verbal description of the firearms, without physically examining them, Special Agent Jacobs advised that, based on his training and experience, the above listed firearm meets the federal definition of a firearm and that it was manufactured outside the State of Michigan and therefore traveled in interstate and/or foreign commerce

## CONCLUSION

11. Based on the above facts, there is probable cause to believe that on February 21, 2023, while in the Eastern District of Michigan, Sean MOORE, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, possessed Taurus, G2C, 9mm, semi-automatic firearm, bearing serial number ABJ923143, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



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Special Agent Brady Rees  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means.

  
Hon. Anthony P. Patti      March 6, 2023  
United States Magistrate Judge